1 THE HON. MARSHA J. PECHMAN 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 WESTERN DISTRICT OF WASHINGTON 9 A.B., by and through her next friend CASSIE No. 14-cv-01178-MJP CORDELL TRUEBLOOD, et al., 10 Plaintiffs, 11 PLAINTIFF'S PROPOSED v. **EXHIBITS FOR HEARING** 12 **BEGINNING JUNE 12, 2023** WASHINGTON STATE DEPARTMENT OF 13 SOCIAL AND HEALTH SERVICES, et al., 14 Defendants. 15 16 Plaintiffs submit the following list of Exhibits for use at the upcoming hearing 17 commencing on June 12, 2023. 18 Plaintiffs have provided these Exhibits to Defendants and discussed them at length. 19 Based on these discussions, Plaintiffs do not anticipate objections from Defendants on the basis 20 of authentication. 21 Docket number is indicated in the Exhibit List where the document is already in the 22 Court record. 23 PLAINTIFF'S PROPOSED EXHIBITS FOR HEARING -Disability Rights Washington C14-01178-MJP

315 5th Avenue South, Suite 850 Seattle, Washington 98104 (206) 324-1521 · Fax: (206) 957-0729

EXHIBIT		DOCKET
NO.	TITLE	NO.
	Declaration of Keven Bovenkamp in Support of	Dkt. No. 944
1	Defendant's Response to Plaintiff's Motion for	
	Material Breach and Contempt, Jan. 11, 2023	
	Declaration of Tom Kinlen in Support of Defendant's	Dkt. No. 947
2	Response to Plaintiff's Motion for Material Breach and	
	Contempt, Jan. 11, 2023	27/1
	Washington State Department of Social and Health	N/A
3	Services (DSHS), Presentation to Washington Senate	
	Law and Justice Committee: Competency Services	
	Update, Feb. 2, 2023	D1 / N 020 2
	Governor Jay Inslee Policy Brief: Transforming	Dkt. No. 939-2
4	Washington's Behavioral Health Care System, Dec.	
	2018	D1-4 024 1 -4
	Letter from Kevin Bovenkamp to DSHS Secretary	Dkt. 924-1 at
5	Jilma Meneses, RE: WSH and Potential Impacts to	23-24
	Admissions, Sept. 9, 2022	D1 + 044 7
	Email from Cassie Sauer, President and CEO of	Dkt. 944-7
6	Washington State Hospital Association, Subject: DSHS	
	looking for civil commitment beds—can you help?	
	Nov 7, 2022  Kevin Bovenkamp, Letter to State Partners RE:	Dkt. 944-1
	Hospital Admission Triaging, Dec 14, 2022	DKI. 344-1
7	Hospital Admission Haging, Dec 14, 2022	
	Washington State Health Care Authority (HCA), Long	Dkt. 946-2
8	Term Civil Commitment Investments and Capacity	
	Washington State HCA, Implementation plan to	Dkt. 939-5
9	continue the expansion of civil long-term inpatient	
	capacity, Dec. 1, 2021	
	Washington State HCA, Implementation plan to	N/A
10	continue the expansion of civil long-term inpatient	
	capacity: Status report, Oct. 15, 2022	
	Dr. Danna Mauch, Court Monitor Quarterly Report to	N/A
11	the Court—Narrative Volume, Jan. 16, 2023	
11	,	

12	Dr. Danna Mauch, Court Monitor Quarterly Report to the Court—Narrative Volume, June 8, 2023
Dated this 9	th day of June, 2023.
	Respectfully submitted,
	/s/ Kimberly Mosolf
	David R. Carlson, WSBA No. 35767 Kimberly Mosolf, WSBA No. 49548
	Elizabeth Leonard, WSBA No. 46797 Disability Rights Washington
	315 Fifth Avenue South, Suite 850 Seattle, WA 98104
	(206) 324-1521 davidc@dr-wa.org
	kimberlym@dr-wa.org bethl@dr-wa.org
	oeim@ur wa.org
	/s/Christopher Carney Christopher Carney, WSBA No. 3032
	Carney Gillespie Isitt PLLP 600 1st Avenue, Seattle, WA 98104
	Seattle, Washington 98104
	(206) 445-0212 Christopher.Carney@cgilaw.com
	Au C. Di : 1500
	Attorneys for Plaintiffs